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10 | Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

15 DAISY ALVAREZ, individually and as
16 successor in interest to Ricardo Andrade,
deceased.

Case No.: 2:25-cv-02490

District Judge Michael W. Fitzgerald

17 || Plaintiffs,

**JOINT STIPULATION TO ALLOW
PLAINTIFF TO AMEND
COMPLAINT TO NAME THE
INDIVIDUAL OFFICERS IN PLACE
OF DOE DEFENDANTS 1-3**

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CITY OF PASADENA, et al.

[Proposed Order; Exhibit A (redlined amended complaint; Exhibit B (clean amended complaint) filed concurrently herewith]

21 || Defendants.

1 **TO THIS HONORABLE COURT:**

2 **IT IS HEREBY STIPULATED** by and between Plaintiff Daisy Alvarez, and
3 Defendants CITY OF PASADENA (“the Parties”), by and through their respective
4 attorneys of record, as follows:

- 5 1. Plaintiff filed her Complaint on March 3, 2025. At the time of the filing of
6 their Complaint, Plaintiff was genuinely ignorant of the names of the City
7 of Pasadena Police Department employees and/or individuals who used
8 force during the incident giving rise to this lawsuit. Subsequently,
9 Plaintiff has discovered information that Officers John Lewy, Kalvin
10 Blake, and Taylor Vincent are the City of Pasadena Police Department
11 employees who used force against the decedent during the incident giving
12 rise to this lawsuit.
- 13 2. The Parties agree that Plaintiff may file an amended complaint for the
14 purpose of naming Officers John Lewy, Kalvin Blake, and Taylor Vincent
15 as individual defendants in place of Doe Defendants 1-3. A copy of
16 Plaintiff’s proposed First Amended Complaint (redlined) is attached hereto
17 as “Exhibit A.” A copy of Plaintiff’s proposed First Amended Complaint
18 (clean) is attached hereto as “Exhibit B.”
- 19 3. Counsel for the City of Pasadena agrees to accept service of the First
20 Amended Complaint on behalf of the City of Pasadena.
- 21 4. Plaintiff shall have 7 days to file their First Amended Complaint after the
22 Court grants her leave to do so. Defendant City of Pasadena shall have 21
23 days thereafter to file a responsive pleading.

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25 **IT IS SO STIPULATED.**

1 DATED: July 30, 2025

LAW OFFICES OF DALE K. GALIPO

2 By: s/ *Renee V. Masongsong*

3 Dale K. Galipo

4 Renee V. Masongsong

5 *Attorneys for Plaintiff*

6 DATED: July 30, 2025

CONLOGUE LAW, LLP

7 By: /s/ *Kevin S. Conlogue*

8 Kevin S. Conlogue

9 Ashley M. Conlogue

10 *Attorneys for Plaintiff*

11 DATED: July 30, 2025

BURKE, WILLIAMS & SORENSEN, LLP

12 By: /s/ *Caylin Jones*

13 Nathan A. Oyster

14 Caylin W. Jones

15 Attorney for Defendant

16 CITY OF PASADENA

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